

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

KENNETH BOLLING,
Plaintiff,

V.

**CITY OF MONTGOMERY,
Defendant.**

Civil Action No.: 2:19-cv-244-RAH

DEFENDANT'S WITNESS LIST

COMES NOW the Defendant City of Montgomery, and submits the following names of potential witnesses to be called in the trial of the above styled matter:

EXPECT TO CALL:

1. Chief Miford Jordan
2. J.L. Petrey
3. Matthew Manning
4. Earnest Finley, III
5. Thomas Hawkins
6. Carrie Dunnivan
7. Ronald Sams
8. Bill Barousse
9. Kim Neese

10. Carmen Douglass
11. City of Montgomery Corporate Representative
 - a. City Employee Handbook
 - b. Personnel Rules
 - c. Employee Benefits

MAY CALL:

12. Claire King
13. Brian Champlin
14. Jason Hunt
15. Ken Nixon, Court Administrator
16. Kenneth Bolling, Plaintiff
17. Martha Earnhardt
18. Betty Gates
19. Assistant Chief Stanley Cooper
20. Assistant Chief Ronnie Bozeman
21. Deputy Chief A.L. Wright
22. Lisa McKinnon
23. Ebony McKinnon
24. Keiona Bolling
25. All witnesses identified on Plaintiff's Witness List.
26. Any witnesses necessary for rebuttal.
27. Any witnesses necessary for impeachment.
28. Any witness necessary for authentication of evidence.

29. Any witnesses discovered hereafter.

30. The Defendant reserves the right to amend this witness list if necessary.

Dated this the 4th day of January, 2021.

/s/ Ashley N. Smith

ASHLEY N. SMITH (SMI312)

Attorney for Defendant

ASB-7096-A56S

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following counsel of record via the Court's CM/ECF filing system on January 4, 2021:

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/s/ Ashley N. Smith
ASHLEY N. SMITH